

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

STATE OF TEXAS,)
STATE OF MISSOURI,)
)
Plaintiffs,)
)
v.) Civil Action No. 2:21-cv-00067-Z
)
JOSEPH R. BIDEN, JR.,)
in his official capacity as)
President of the United States, *et al.*,)
)
Defendants.)
)

**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE
RESPONSE TO PLAINTIFFS' AMENDED COMPLAINT**

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Defendants hereby move this Court to extend the time for Defendants to answer or respond to Plaintiffs' Amended Complaint until 30 days after the Court rules on Plaintiffs' pending Motion for Preliminary Injunction (ECF No. 53). Otherwise, Defendants' responsive pleading to Plaintiffs' Complaint would be due June 21, 2021. Defendants have conferred with Plaintiffs concerning this motion. Plaintiffs do not oppose Defendants' request for an extension of time except insofar as it would have collateral consequences for issues like the availability of discovery or consolidation under Rule 65. Plaintiffs preserve their position that, in the event such issues arise, any delay in filing a responsive pleading should not prejudice the resolution of those issues.

Good cause exists for such an extension. The Court's resolution of Plaintiffs' Motion for Preliminary Injunction is likely to substantially affect subsequent proceedings in this litigation. Accordingly, extending the time for Defendants to answer or otherwise respond until 30 days after the Court resolves that motion will likely conserve the Parties' and the Court's resources. No previous extensions have been sought or granted.

Date: June 16, 2021

Respectfully submitted,

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CERTIFICATE OF CONFERENCE

This is to certify that I have conferred with counsel for Plaintiffs about the relief requested herein and they do not oppose Defendants' request for an extension of time except insofar as it would have collateral consequences for issues like the availability of discovery or consolidation under Rule 65. Plaintiffs preserve their position that, in the event such issues arise, any delay in filing a responsive pleading should not prejudice the resolution of those issues.

/s/ Francesca Genova

Francesca Genova
Trial Attorney
United States Department of Justice
Civil Division

CERTIFICATE OF SERVICE

I hereby certify that on June 16, 2021, I electronically filed the foregoing document with the Clerk of the Court for the United States District Court for the Northern District of Texas by using the CM/ECF system. Counsel in the case are registered CM/ECF users and service will be accomplished by the CM/ECF system.

/s/ Francesca Genova

Francesca Genova
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